

From: [Ken Wiegardt](#)
To: [Rockett, Derek \(ECY\)](#)
Subject: Comment letter on scoping for Iminicloprid EIS
Date: Friday, February 14, 2014 2:55:16 PM

Derek Rockett, Permit Writer
Washington Department of Ecology
Southwest Regional Office
PO Box 47775
Olympia, Washington 98504
delivered via: derek.rockett@ecy.wa.gov

Dear Mr. Rockett:

I'm writing this letter to provide my input on what I feel should be included in the EIS on using Iminicloprid to control burrowing shrimp in Willapa Bay and Grays Harbor. I'm a fifth generation shellfish farmer who has been working the tidelands of Willapa Bay my entire life.

Economics are certainly important. The shellfish industry is the largest private employer in Pacific County. Without an effective tool to control burrowing productivity on our farms will production will fall drastically. My company currently employs 60 people with an annual payroll of over two million dollars. And my company is only one of several. Without the economic input of the shellfish farmers many communities will fall on hard times.

Environmental impact of not controlling burrowing shrimp is another serious matter. Shellfish farming is more of an art than a science. In order for shellfish to flourish you need a perfectly balanced environment. Many have likened oysters to the canary in the gold mines. If anything is wrong with the environment the shellfish are usually the first to suffer. Burrowing shrimp throw this balance extremely off kilter. The shrimp will create a monoculture where nothing else can survive. A healthy shellfish bed is full of biodiversity.

Finally, lately there has been a bit of a stir about the proposed use of Iminicloprid affecting bees. I wholeheartedly disagree with this. The project areas will be significantly geographically separated from any possible natural bee habitat. I have never in over 30 yrs witnessed a bee out on the tideflats.

Thank you,

Ken Wiegardt